



February 18, 2010
VIA ECFS

Ms. Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
2009 CPNI Certification Filing for Leap Frog Telecom, L.L.C. d/b/a Voce

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2010-01, DA 10-91, EB Docket No. 06-36, released January 15, 2010 and pursuant to 47 C.F.R. § 64.2009(e), Leap Frog Telecom, L.L.C. d/b/a Voce files its Certification and attached Statement of Customer Proprietary Network information (CPNI) for the year 2009. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

/s/Sharon Thomas
Sharon Thomas
Consultant to Leap Frog Telecom, L.L.C.
d/b/a Voce

ST/im.

Enclosure

cc: Best Copy and Printing FCC@BCPIWEB.COM
R. Toracca, Leap Frog Telecom
File: Leap Frog - FCC CPNI
TMS: FCC1001

EB Docket 06-36

Attachments: Accompanying Statement explaining CPNI procedures

Leap Frog Telecom, L.L.C. d/b/a Voce Telecom

Statement of CPNI Procedures and Compliance

Leap Frog Telecom, L.L.C. d/b/a Voce Telecom ("Voce" or "Company") provides wholesale telecommunications services to other carriers and as such does not have any subscribed service relationship with any business or residential customers. The Company does not obtain, retain or use CPNI for any purpose. Although the Company does have call detail records, it does not have any information regarding the calling or called party, such information is not used for marketing purposes. Voce is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company provides for disciplinary action for such violations, up to and including termination of employment.

Moreover, Voce does not market its services to end users in any fashion. Its marketing efforts are directed towards resellers and other carriers and such efforts do not include the use of CPNI or call detail records. Voce does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. Voce does not provide CPNI to third parties, unless the request is made pursuant to a valid subpoena, court order, or other legally authorized request.

The Company does not disclose call record information over the telephone or on-line. The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should Voce expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means as required by FCC regulations. The company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI. If the Company receives no response

from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

The company has processes in place to ensure that it maintains electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI, as well as to customers, for a period of at least two years. Information regarding any breaches and notifications will be maintained by a designated supervisor level employee responsible for managing the company's CPNI compliance.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.